

1 LEON DAYAN (State Bar No. 153162)  
ABIGAIL V. CARTER\*  
2 RAMYA RAVINDRAN\*  
LANE M. SHADGETT\*  
3 J. ALEXANDER ROWELL\*  
**BREDHOFF & KAISER P.L.L.C.**  
4 805 Fifteenth Street NW, Suite 1000  
Washington, DC 20005  
5 Telephone: (202) 842-2600  
Facsimile: (202) 842-1888  
6 ldayan@bredhoff.com  
acarter@bredhoff.com  
7 rravindran@bredhoff.com  
lshadgett@bredhoff.com  
8 arowell@bredhoff.com  
\*Application *pro hac vice* forthcoming

9 Daniel Feinberg, SBN 135983  
10 Catha Worthman, SBN 230399  
Anne Weis, SBN 336480  
11 **FEINBERG, JACKSON, WORTHMAN  
& WASOW, LLP**  
12 2030 Addison Street, Suite 500  
Berkeley, CA 94704  
13 Tel. (510) 269-7998  
Fax (510) 269-7994  
14 dan@feinbergjackson.com  
catha@feinbergjackson.com  
15 anne@feinbergjackson.com

16 *Attorneys for Plaintiffs*

17 **UNITED STATES DISTRICT COURT**  
18 **NORTHERN DISTRICT OF CALIFORNIA**  
19 **SAN FRANCISCO DIVISION**

20 AMERICAN FEDERATION OF  
21 GOVERNMENT EMPLOYEES, AFL-CIO, et  
al.,

22 Plaintiffs,

23 v.

24 DONALD J. TRUMP, in his official capacity as  
25 President of the United States, et al.,

26 Defendants.

Case No.: 3:25-cv-03070-JD

**DECLARATION OF ERIC BUNN SR.**

**DECLARATION OF ERIC BUNN SR.**

I, Eric Bunn Sr., declare as follows:

1. I am over 18 years of age and competent to give this declaration. This declaration is based on my personal knowledge, information, and belief.

2. I am the National Secretary-Treasurer at the American Federation of Government Employees, AFL-CIO ("AFGE"), a labor organization and unincorporated association that represents approximately 800,000 federal civilian employees through its affiliated councils and locals in every state in the United States.

3. I have been National Secretary-Treasurer at AFGE since April 2020.

4. On April 1, 2025, the AFGE Finance Department was expecting to receive dues totaling \$1,119,060.03 from the National Finance Center from approximately sixty-four (64) Federal Agencies.

5. A true and correct copy of the affected Federal Agencies is attached hereto as **Exhibit 1**.

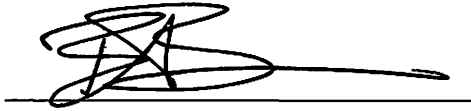
6. The AFGE Finance Department did not receive those dues from the National Finance Center on April 1, 2025.

7. I directed my staff in the AFGE Finance Department reach out via email to Wendy Banks at the National Finance Center, on April 3, 2025, to inquire as to the status of those missing dues.

8. The National Finance Center, via Wendy Banks, informed AFGE that the dues were terminated pursuant to NFC's adherence to Executive Order 14251 titled "Exclusions From Federal Labor-Management Relations Programs."

9. A true and correct copy of the email inquiry titled "Agency Dues Payment NOT Received this week – Need HELP 04.03.25" sent by AFGE Finance Department to the National Finance Center on April 3, 2025, and the response thereto from Wendy Banks, is attached hereto as **Exhibit 2**.

1 I declare under penalty of perjury under the laws of the United States that the foregoing is  
2 true and correct. Executed April 3, 2025, in Washington, D.C.

3  
4 

5 Eric Bunn  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27

# **EXHIBIT 1**

AgencyCode	Agency
AAFES	Army Air Force Exchange Service
ACOE	Army Corps of Engineers
AFMC	Air Force Material Command
AFRH	Armed Forces Retirement Home
AFSOC	Air Force Special Operation Command
AID	Agency for International Development
ANG	Air National Guard
APHIS	Animal and Plant Health Inspection Service
ARMY	Army
ARMYJMC	Army Joint Munitions Command
BLM	Bureau of Land Management
BOP	Bureau of Prisons
CDC	Center for Disease Control
CIS	Citizenship and Immigration Services
CNRSE	Command Navy Region Southeast
DCAA	Defense Contract Audit Agency
DCMA	Defense Contract Management Agency
DECA	Defense Commissary Agency
DFAS	Defense Finance Accounting Services
DHA	Defense Health Agency
DHS HQ	Department of Homeland Security HQ
DISA	Defense Information Systems Agency
DLA	Defense Logistics Agency
DMEDA	Defense Media Agency
DOD	Department of Defense
DODDS	Department of Defense Dependents Schools
DODEA	DOD Education Activity
DODFC	DOD Federal Contractors
DOE	Department of Energy
DOI	Department of the Interior
DOS	Department of State
DTIC	Defense Technical Information Center
EPA	Environmental Protection Agency
FDA	Food and Drug Administration
FEMA	Federal Emergency Management Agency
FISCSE	Fleet Industrial Supply Center Southeast Region
FSIS	Food Safety and Inspection
GSA	General Services Administration
HHS	Health and Human Services
ICE	Immigration and Customs Enforcement
ICE-PRO	Immigration and Customs Enforcement Professional Staff (Attorneys)
MCAS	Marine Corp Air Station
MEPS	Military Entrance Processing Service

AgencyCode	Agency
MINT	United States Mint
NAVFACSE	Navy Facilities Region Southeast
NAVY	Navy
NAVYSE	Navy Region Southeast
NG	National Guard
NGT	National Guard Technician
NIH	National Institute of Health
NSF	National Science Foundation
OCIO	Office of the Chief Information Officer
OPM	Office of Personnel Management
PFP	Pentagon Force Protection Agency
TSA	Transportation Security Administration
USAF	United States Air Force
USCG	US Coast Guard
USCGA	US Coast Guard Academy
USITC	US International Trade Commission
USMC	United States Marine Corp
USNA	US Naval Academy
USUHS	Uniform Services University of the Health Sciences
VA	Veterans Administration

# **EXHIBIT 2**



**Subject:** FW: Agency Dues Payment NOT Received this week - Need HELP 04.03.25

---

**From:** Banks, Wendy - OCFO-NFC <[wendy.banks@usda.gov](mailto:wendy.banks@usda.gov)>  
**Sent:** Thursday, April 3, 2025 11:17 AM  
**To:** Jeanne Che <[CHEJ@afge.org](mailto:CHEJ@afge.org)>  
**Cc:** Negash Solomon <[SolomN@afge.org](mailto:SolomN@afge.org)>; Di Tang <[Di.Tang@afge.org](mailto:Di.Tang@afge.org)>  
**Subject:** RE: Agency Dues Payment NOT Received this week - Need HELP 04.03.25

**This Message Is From an External Sender**

This message came from outside your organization.

Report Suspicious

I will check with the Requirements Branch and get back to you.

Thanks.

---

**From:** Jeanne Che <[CHEJ@afge.org](mailto:CHEJ@afge.org)>  
**Sent:** Thursday, April 3, 2025 10:16 AM  
**To:** Banks, Wendy - OCFO-NFC <[wendy.banks@usda.gov](mailto:wendy.banks@usda.gov)>  
**Cc:** Negash Solomon <[SolomN@afge.org](mailto:SolomN@afge.org)>; Di Tang <[Di.Tang@afge.org](mailto:Di.Tang@afge.org)>  
**Subject:** RE: Agency Dues Payment NOT Received this week - Need HELP 04.03.25

Hi Wendy,

We noticed the EO issued on 3/27/25. Because the dues deductions were taken out from payroll for pay period 3/9 – 3/22 with pay date on 3/31, we thought we would receive the dues payments for this pay period. FYI, we received the union dues deduction files on 3/29/25.

Can you double check please?

Thanks.

---

**From:** Banks, Wendy - OCFO-NFC <[wendy.banks@usda.gov](mailto:wendy.banks@usda.gov)>  
**Sent:** Thursday, April 3, 2025 11:12 AM  
**To:** Jeanne Che <[CHEJ@afge.org](mailto:CHEJ@afge.org)>  
**Cc:** Negash Solomon <[SolomN@afge.org](mailto:SolomN@afge.org)>; Di Tang <[Di.Tang@afge.org](mailto:Di.Tang@afge.org)>  
**Subject:** RE: Agency Dues Payment NOT Received this week - Need HELP 04.03.25

Good morning Jeanne,  
The following Executive Order was issued so NFC is adhering to that order and is currently finalizing the necessary changes/actions.

EO <https://www.whitehouse.gov/presidential-actions/2025/03/exclusions-from-federal-labor-management-relations-programs/>

I'm thought the unions would have received this as well.



I hope this helps.

Thanks.

---

**From:** Jeanne Che <[CHEJ@afge.org](mailto:CHEJ@afge.org)>  
**Sent:** Thursday, April 3, 2025 10:06 AM  
**To:** Banks, Wendy - OCFO-NFC <[wendy.banks@usda.gov](mailto:wendy.banks@usda.gov)>  
**Cc:** Negash Solomon <[SolomN@afge.org](mailto:SolomN@afge.org)>; Di Tang <[Di.Tang@afge.org](mailto:Di.Tang@afge.org)>  
**Subject:** RE: Agency Dues Payment NOT Received this week - Need HELP 04.03.25

Hello Wendy,

Hope all is well.

We have received agency union dues files for F440007, F440013 and F440014 but we haven't received actual union dues payments. Can you check the payment status for us or provide contact information to inquire payment status?

The union dues payments usually come in on Tuesday. Below is the dues payment detail that we did not receive this week.

dues file 1 (F440007)	554,480.92	
dues file 2 (F440014)	536,998.79	
dues file 3 (F440013)	27,580.32	
dues file total	1,119,060.03	ACH payment not received

Thanks

Jeanne

This electronic message contains information generated by the USDA solely for the intended recipients. Any unauthorized interception of this message or the use or disclosure of the information it contains may violate the law and subject the violator to civil or criminal penalties. If you believe you have received this message in error, please notify the sender and delete the email immediately.